

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Conflict International, Inc. and Conflict International
Ltd.

Plaintiffs, : 23-cv-2165 (ER)
v. : **NOTICE OF MOTION FOR
PRELIMINARY
INJUNCTION AND
TEMPORARY
RESTRANDING ORDER**
Stephen Komorek and API International Consulting :
Group, Inc., :
Defendants. :

PLEASE TAKE NOTICE THAT:

Upon the Verified Complaint dated March 14, 2023, the exhibits annexed thereto, and upon the accompanying Memorandum of Law in Support of a preliminary injunction and temporary restraining order, the Petitioners will move this Court before the Honorable Edgardo Ramos, Courtroom 619, at the United States Courthouse, 40 Foley Square , in the City, County and State of New York, on the **15th day of March 2023** at 11:30 o'clock in the forenoon thereof, or as soon thereafter as counsel may be heard, for an Order pursuant to Rule 65(a) of the Federal Rules of Civil Procedure enjoining Respondents from violating the Non-Disclosure Agreement in any manner and from disclosing, divulging, furnishing, or making accessible to anyone confidential or proprietary information in their knowledge or possession.

PLEASE TAKE FURTHER NOTICE that the Petitioners also move this Court for an Order pursuant to Rule 65(b) of the Federal Rules of Civil Procedure that, pending the hearing and determination of the within motion for a Preliminary Injunction pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, the Respondents from violating the Non-Disclosure Agreement

in any manner and from disclosing, divulging, furnishing, or making accessible to anyone confidential or proprietary information in their knowledge or possession.

Petitioners respectfully pray the Court issue the proposed Temporary Restraining Order attached pending the hearing and determination of the Motion for Preliminary Injunction.

Dated: 14th day of March, 2023
New York, New York

Respectfully Submitted,

J. W. BEARDEN & ASSOCIATES, PLLC

/s/ Wes Bearden

James "Wes" Bearden
Pro Hac Vice Admission Pending
New York Bar No. 5806500
Texas Bar No. 24071964
Louisiana Bar No. 33004
District of Columbia Bar No. 1671443
1341 Mockingbird Lane, Suite 820
Dallas, Texas 75247
Tel: (214) 396-7622
Fax: (888) 731-6940
Email: wes@beardenlawfirm.com

Ashley Mule'
Pro Hac Vice Admission Pending
Louisiana Bar No. 30191
110 Veterans Memorial Blvd, Suite 500
Metairie, LA 70005
Tel: (504) 301-8677
Fax: (888) 731-6940
Email: ashley@beardenlawfirm.com

Christopher Roesch Neff
Moskowitz Colson Ginsberg & Schulman, LLP
80 Broad St., Suite 1900
New York, NY 10004
Tel: (212) 257-6451
Fax: (212) 398-8835
Email: cneff@mccsllp.com

ATTORNEYS FOR PLAINTIFFS